

March 17, 2020

VIA ECF

The Honorable Jesse M. Furman
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

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Re: *Homeward Residential, Inc. v. Sand Canyon Corp.*, 12-cv-5067 (JMF/JLC)

Dear Judge Furman:

I write pursuant to Section 6 of the Court's Electronic Case Filing Rules & Instructions and Your Honor's Individual Rules of Practice respectfully to seek leave to file under seal certain materials in connection with Defendant Sand Canyon Corporation's Reply Memorandum of Law in Further Support of Defendant Sand Canyon Corporation's Omnibus *Daubert* Motion, and to redact from its public filings the Confidential Materials and references thereto. Our papers are due today pursuant to the Court's schedule and will be filed simultaneously.

The Confidential Materials are in Defendant Sand Canyon Corporation's Memorandum of Law in Further Support of Defendant Sand Canyon Corporation's Omnibus *Daubert* Motion, the supporting Declaration of Brian C. Kerr, and the accompanying exhibit to that Declaration. These Confidential Materials consist of references to documents and deposition testimony that the parties have designated as "Confidential" and "Highly Confidential" under the Protective Order (ECF No. 66).

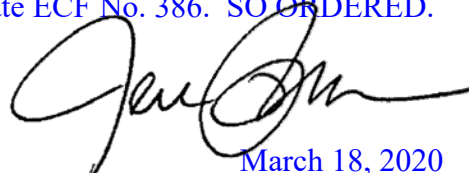
Pursuant to Your Honor's Individual Rules of Practice, Counsel for Defendant Sand Canyon will submit a courtesy copy of all related motion papers and exhibits. While these copies may be delayed slightly given the current disruption, we will provide them as soon as possible.

Accordingly, Sand Canyon respectfully requests leave to file the Confidential Materials under seal.

Respectfully submitted,

/s/ Michael Calhoon
Michael Calhoon

cc: All Counsel (by ECF) No paper courtesy copies should be submitted to the Court, pursuant to the Court's Emergency Individual Rules and Practices. Defendant's motion is temporarily GRANTED. The court will decide whether to keep the materials under seal when deciding the underlying motions. The Clerk of Court is directed to terminate ECF No. 386. SO ORDERED.



March 18, 2020